NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding an Part 70 Permit Significant Source Modification

for Cooper Tire & Rubber Company in Dekalb County

Part 70 No.: 033-6253-00013 Significant Source Modification No.: 033-12932-00013

Notice is hereby given that the above mentioned company, located at 207 South West Street, Auburn Indiana, 46706 has made application to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for a Significant Source Modification to a Part 70 source for the construction of one rotary press.

Notice is hereby given that there will be a period of thirty (30) days from the date of publication of this notice during which any interested person may comment on why this proposed permit should or should not be issued. Appropriate comments should be related to air quality issues, interpretation of the applicable state and federal rules, calculations made, technical issues, or the effect that the operation of this facility would have on any aggrieved individuals. IDEM, OAQ does not have jurisdiction in specifying and implementing requirements for zoning, odor or noise. For such issues, please contact your local officials.

A copy of the application and draft permit is available for examination at the Eckhart Public Library, 603 S Jackson Street, Auburn, 46706-2298. A copy of the draft permit is also available for examination at www.state.in.us/idem/oaq/index.html. All comments, along with supporting documentation, should be submitted in writing to the IDEM, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana 46206-6015. If appropriate adverse comments concerning the <u>air pollution impact</u> of this proposed source are received, together with a request for a public hearing, such a hearing may be held to give further consideration to this application.

Persons not wishing to comment at this time, but wishing to receive notice of future proceedings conducted related to this action, must submit a written request to the Office of Air Quality (OAQ), at the above address. All interested parties of record will receive a notice of the decision on this matter and will then have 15 days after receipt of the Notice of Decision to file a petition for administrative review. Procedures for filing such a petition will be enclosed with the Notice.

Pursuant to Contract No. A305-0-00-36, IDEM, OAQ has assigned the processing of this application to Eastern Research Group, Inc., (ERG). Therefore, questions should be directed to Eric Goehl, ERG, P.O. Box 2010, Morrisville, North Carolina 27560, or call (919) 468-7891 to speak directly to Mr. Goehl. Questions may also be directed to Duane Van Laningham at IDEM, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call (800) 451-6027, press 0 and ask for Duane Van Laningham, or extension 3-6878, or dial (317) 233-6878.

Paul Dubenetzky, Chief Permits Branch Office of Air Quality Cooper Tire and Rubber Company Standard Automotive - NVH Division 207 South West Street Auburn, Indiana 46706

Re: Significant Source Modification No: 033-12932-00013

Dear Mr. Burenbark

Cooper Tire and Rubber Company applied for a Part 70 operating permit on July 9, 1996 for tire and rubber manufacturing. An application to modify the source was received on November 3, 2000. Pursuant to 326 IAC 2-7-10.5 the following emission units are approved for construction at the source:

One (1) injection molding press, identified as rotary press 323 to be added to their existing rubber part manufacturing line.

The proposed Significant Source Modification approval will be incorporated into the pending Part 70 permit application pursuant to 326 IAC 2-7-10.5(I)(3). If there are no changes to the proposed construction of the emission units, the source may begin operating on the date that IDEM receives an affidavit of construction pursuant to 326 IAC 2-7-10.5(h). If there are any changes to the proposed construction the source can not operate until an Operation Permit Validation Letter is issued.

Pursuant to Contract No. A305-0-00-36, IDEM, OAQ has assigned the processing of this application to Eastern Research Group, Inc., (ERG). Therefore, questions should be directed to Eric Goehl, ERG, P.O. Box 2010, Morrisville, North Carolina 27560, or call (919) 468-7891 to speak directly to Mr. Goehl. Questions may also be directed to Duane Van Laningham at IDEM, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call (800) 451-6027, press 0 and ask for Duane Van Laningham, or extension 3-6878, or dial (317) 233-6878.

Sincerely,

Paul Dubenetzky, Chief Permits Branch Office of Air Quality

ERG/EG

cc: File - DeKalb County U.S. EPA, Region V

DeKalb County Health Department

Northern Regional Office

Air Compliance Section Inspector - Doyle Houser

Compliance Data Section - Karen Nowak

Administrative and Development - Janet Mobley Technical Support and Modeling - Michele Boner

PART 70 SIGNIFICANT SOURCE MODIFICATION OFFICE OF AIR QUALITY

Cooper Tire and Rubber Company Cooper-Standard Automotive 207 South West Street Auburn, Indiana 46706

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this permit.

This approval is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Source Modification No.: 033-12932-00013	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: May 16, 2001

Cooper Tire and Rubber Company Auburn, Indiana

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Part 70 Source Modification Certification Form Part 70 Source Modification Quarterly Form

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary source that produces tire and other rubber products.

Responsible Official: George Hertsel, Plant Manager

Source Address: 207 South West Street, Auburn, Indiana 46706 Mailing Address: 207 South West Street, Auburn, Indiana 46706

SIC Code: 3061 County Location: DeKalb

County Status: Attainment for all criteria pollutants

Source Status: Part 70 Permit Program,

Major Source, under PSD;

Major Source, Section 112 of the Clean Air Act

A.2 Emissions units and Pollution Control Equipment Summary

This stationary source is approved to construct and operate the following emissions units and pollution control devices:

(a) One (1) injection molding press, identified as rotary press 323, with a limited maximum throughput of 2,673,990 pounds of rubber per year exhausting through building ventilation.

A.3 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 Applicability).

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SECTION B GENERAL CONSTRUCTION CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

Terms in this approval shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

B.3 Revocation of Permits [326 IAC 2-1.1-9(5)][326 IAC 2-7-10.5(i)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

B.4 Significant Source Modification [326 IAC 2-7-10.5(h)]

This document shall also become the approval to operate pursuant to 326 IAC 2-7-10.5(h) when, prior to start of operation, the following requirements are met:

- (a) The attached affidavit of construction shall be submitted to the Office of Air Quality (OAQ), Permit Administration & Development Section, verifying that the emission units were constructed in conformance with the request for modification approval. The emissions units covered in the Significant Source Modification approval may begin operating on the date the affidavit of construction is postmarked or hand delivered to IDEM if constructed as proposed.
- (b) If actual construction of the emissions units differs from the construction proposed in the application, the source may not begin operation until the source modification has been revised pursuant to 326 IAC 2-7-11 or 326 IAC 2-7-12 and an Operation Permit Validation Letter is issued.
- (c) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.
- (d) The Permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section and attach it to this document.

However, in the event that the Title V application is being processed at the same time as this application, the following additional procedures shall be followed for obtaining the right to operate:

- (1) If the Title V draft permit has not gone on public notice, then the change/addition covered by the Significant Source Modification will be included in the Title V draft.
- (2) If the Title V permit has gone thru final EPA proposal and would be issued ahead of the Significant Source Modification, the Significant Source Modification will go thru a concurrent 45 day EPA review. Then the Significant Source Modification will be incorporated into the final Title V permit at the time of issuance.
- (3) If the Title V permit has not gone thru final EPA review and would be issued after the Significant Source Modification is issued, then the Modification would be added to the proposed Title V permit, and the Title V permit will issued after EPA review.

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B.5 Phase Construction Time Frame

That pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the IDEM may revoke this approval to construct if the:

(a) Construction of the rotary press has not begun within eighteen (18) months from the effective date of this approval or if during the construction of the rotary press, work is suspended for a continuous period of one (1) year or more.

The OAQ may extend such time upon satisfactory showing that an extension, formally requested by the Permittee is justified.

B.6 BACT Determination for Phase Constructions

That pursuant to 40 CFR 52.21(j)(4), for phase construction projects, the determination of BACT shall be reviewed and modified as appropriate at the latest reasonable time which occurs no later than eighteen (18) months prior to commencement of construction of each independent phase of the project.

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SECTION C

GENERAL OPERATION CONDITIONS

C.1 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this approval or required by an applicable requirement, any application form, report, or compliance certification submitted under this approval shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal requiring certification.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).
- C.2 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]
 - (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days (this time frame is determined on a case by case basis but no more than ninety (90) days) after issuance of this permit, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management Compliance Branch, Office of Air Quality 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

The PMP and the PMP extension notification do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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(d) Records of preventive maintenance shall be retained for a period of at least five

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(5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

C.3 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management Permits Branch, Office of Air Quality 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

The Permittee may implement administrative amendment changes addressed in the (c) request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

C.4 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute (a) averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.5 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment is in operation.

Testing Requirements [326 IAC 2-7-6(1)]

C.7 Performance Testing [326 IAC 3-6]

All testing shall be performed according to the provisions of 326 IAC 3-6 (Source (a) Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

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A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management Compliance Data Section, Office of Air Quality 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.8 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management Compliance Branch, Office of Air Quality 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

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C.9 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. The compliance monitoring plan can be either an entirely new document, consist in whole of information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:
 - (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (General Record Keeping Requirements and General Reporting Requirements) and in Section D of this permit; and
 - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAQ upon request and shall be subject to review and approval by IDEM, OAQ. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:
 - (A) Reasonable response steps that may be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
 - (B) A time schedule for taking reasonable response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to take reasonable response steps may constitute a violation of the permit.
- (c) Upon investigation of a compliance monitoring excursion, the Permittee is excused from taking further response steps for any of the following reasons:
 - (1) A false reading occurs due to the malfunction of the monitoring equipment. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

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(d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

- (e) All monitoring required in Section D shall be performed at all times the equipment is operating. If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.
- (f) At its discretion, IDEM may excuse the Permittee's failure to perform the monitoring and record keeping as required by Section D, if the Permittee provides adequate justification and documents that such failures do not exceed five percent (5%) of the operating time in any quarter. Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.

C.10 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C Performance Testing, of this permit exceed the level specified in any condition of this
 permit, the Permittee shall take appropriate response actions. The Permittee shall
 submit a description of these response actions to IDEM, OAQ, within thirty (30) days of
 receipt of the test results. The Permittee shall take appropriate action to minimize
 excess emissions from the affected facility while the response actions are being
 implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.11 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.12 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

(a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period.

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The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management Compliance Data Section, Office of Air Quality 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

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SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(a) One (1) injection molding press, identified as rotary press 323, with a limited maximum throughput of 2,637,990 pounds of rubber per year exhausting through building ventilation.

(The information describing the process contained in this facility description box is descriptive only and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

- (a) This facility shall use less than 2,673,990 lbs/year of rubber per 12 consecutive month period, rolled on a monthly basis from the rotary press, unit 323. The rubber usage limitation equals 8.9 tons per year of VOC and when summed with the emissions from the increased utilization of the existing equipment of 29.3 tons per year yields a total VOC of 38 tons per year. This is less than the Prevention of Significant Deterioration criteria of 40 tons per year.
- (b) The emissions from the existing coating units 315 (or 305) and 316 contribute the majority of the increased utilization emissions 28.6 of the 29.3 tons a year. These units shall emit less than 0.19 lbs of VOC per part coated.

Compliance with these limits makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

D.1.2 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]

(a) The limits described in D.1.1 will also satisfy 326 IAC 8-1-6. Any change or modification which may increase the potential emissions to 25 tons per year or more of volatile organic compounds at any oven must be approved by the Office of Air Quality before any such change may occur.

D.1.3 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the PM from the rotary press shall not exceed the 1.23 pounds per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

 $E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.5 Record Keeping Requirements

(a) To document compliance with Condition D.1.1, the Permittee shall maintain records of monthly rubber usage; number of parts that receive coating and adhesives; amount of monthly VOC usage per part. Cooper Tire and Rubber Company Page 13 of 15
Auburn, Indiana Source Modification No.: 033-12932-00013

Permit Reviewer: ERG/EG

(b) To document compliance with Condition D.1.2, the Permittee shall maintain records of monthly rubber usage which can be used to calculate the weight of VOC emitted each month from the press Unit 323. A worst-case emission factor of 6.68 x 10⁻³ lb VOC/lb rubber is assumed to calculate VOC emissions.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.6 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

Cooper Tire and Rubber Company Auburn, Indiana Permit Reviewer: ERG/EG Page 14 of 15 Source Modification No.: 033-12932-00013

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY COMPLIANCE DATA SECTION

PART 70 SOURCE MODIFICATION CERTIFICATION

Source Name: Cooper Tire and Rubber Company, Cooper-Standard Automotive

Source Address: 207 South West Street, Auburn, Indiana 46706 Mailing Address: 207 South West Street, Auburn, Indiana 46706

Source Modification No.: 033-12932-00013

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this approval.
Please check what document is being certified:
9 Test Result (specify)
9 Report (specify)
9 Notification (specify)
9 Other (specify)
I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
Signature:
Printed Name:
Title/Position:
Date:

Cooper Tire and Rubber Company Auburn, Indiana

Permit Reviewer: ERG/EG

Page 15 of 15 Source Modification No.: 033-12932-00013

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY COMPLIANCE DATA SECTION

Part 7	70 Source Modification Quar	terly Report				
Source Name: Source Address: Mailing Address: Source Modification No.: Facility: Parameter: Limit:	Cooper Tire and Rubber Company, Coop 207 South West Street, Auburn, Indiana 207 South West Street, Auburn, Indiana 033-12932-00013 Rotary Press (Unit 323) and rubber procesystem No. 2 and 3, Extruder unit 010, or Volatile organic compounds (VOC) Input of rubber to the rotary press unit 32 pounds per year is equal to 8.9 tons of V consecutive period, rolled on a monthly be	46706 46706 essed for Unit 323 by Rubber Mixing oating Units 315 (or 305), 316 23 shall be limited to 2,673,990 OC per year for a twelve (12) month				
	YEAR:					
Month	Pounds of Rubber	Pounds of Rubber				
	This Month	Last 12 Month Total				
Month 1						
Month 2						
Month 3						
9	No deviation occurred in this month.					
9	Deviation/s occurred in this month. Deviation has been reported on:					
Submitted Title/Posit Signature Date:	tion:					

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Part 70 Significant Source Modification.

Source Background and Description

Source Name: Cooper Tire and Rubber Company, Cooper-Standard

Automotive

Source Location: 207 South West Street, Auburn, Indiana 46706

County: DeKalb SIC Code: 3061

Operation Permit No.: T 033-6253-00013
Operation Permit Issuance Date: under review
Significant Source Modification No.: 033-12932-00013

Permit Reviewer: ERG/EG

The Office of Air Quality (OAQ) has reviewed a modification application from Cooper Tire and Rubber Company relating to the construction of the following emission units and pollution control devices:

(a) One (1) injection molding press, identified as rotary press 323, with a limited maximum throughput of 2,673,990 pounds of rubber per year exhausting through building ventilation.

History

On November 3, 2000, Cooper Tire and Rubber Company submitted an application to the OAQ requesting to add an injection molding press to their existing plant. Cooper Tire and Rubber Company submitted a Part 70 permit application to OAQ for review.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 Significant Source Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on November 3, 2000. Additional information was received on December 6, 2000 and January 16, 2001.

Emission Calculations

See Appendix A of this document for detailed emission calculations.

Potential To Emit of Modification

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA."

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)						
PM	2.0						
PM-10	2.0						
SO ₂	0						
VOC	46.42						
СО	0						
NO _x	0						

HAP's	Potential To Emit (tons/year)
Xylene	3.2
Ethylbenzene	0.8
MIBK	13.4
Phenol	0.2
Toluene	17.4
Formaldehyde	0.02
Ethylene Glycol	0.01
Other	2.6
TOTAL	37.6

Justification for Modification

The Part 70 Operating permit is being modified through a Part 70 Significant Source Modification. This modification is being performed pursuant to 326 IAC 2-7-10(f)(4)(D) as PTE VOC emissions are greater than twenty-five (25) tons a year.

County Attainment Status

The source is located in DeKalb County.

Pollutant	Status
PM-10	attainment
SO ₂	attainment
NO_2	attainment
Ozone	attainment
СО	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NOx) are precursors for the formation of ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to the ozone standards. DeKalb County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) DeKalb County has been classified as attainment or unclassifiable for PM-10 sulfur dioxide (SO₂), NO₂, PM-10, CO, lead, and ozone. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Source Status

Existing Source PSD Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/yr)
PM	greater than 250
PM-10	greater than 250
SO ₂	75
VOC	greater than 250
СО	29
NO _x	49

- (a) This existing source is a major stationary source because an attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is one of the 28 listed source categories.
- (b) These emissions are based upon draft TSD of Part 70 permit T033-6253-00013.

Potential to Emit of Modification After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 source modification.

		Potential to Emit (tons/year)											
Process/facility	PM	PM-10	SO ₂	VOC	СО	NO _x	HAPs						
New Equipment													
Rotary Press (Platen Curing Unit 323)	0	0	0	8.9	0	0	1.8						
Increased Utilization of Existing Equipment													
Adhesive and Primer Coating (Units 315 or 305, 316)	0.4	0.4	0	28.6	0	0	28.8						
Rubber Mixing System No. 2 and 3	1.2	1.2	0	0.6	0	0	0.2						
Extruder Unit 010	0	0	0	0.1	0	0	0.1						
Significant Levels	25	15	40	40	100	40							
Total	1.6	1.6	0	38.2	0	0	30.9						

This modification to an existing major stationary source is not major because the limited emission increase is less than the PSD significant levels. The determination was made that the increase in production will increase the utilization of non-modified units and that it is not a debottlenecking of the plant. The total PTE increase is 41 tons per year of VOC. The plant asked to limit the use of rubber per year to stay at 38 tons per year of VOC. As a result, the limited emissions from the increased utilization plus the new limited emissions from the new unit do not exceed 40 tons per year of VOC. The existing coatings lines, unit 315 and 316, do not have prior emission limitations. Unit 305 does have an existing emission limitation of 32 tons per year for the entire line. If Cooper uses these units to coat parts for the rotary press, unit 323, then the lines combined are limited to 0.19 lbs of VOC per coated part.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this proposed modification.

State Rule Applicability - Individual Facilities

326 IAC 2-2 (Prevention of Significant Deterioration)

326 IAC 2-2 does not apply because the facility is limited to less than 2,673,990 lbs of rubber per year from the rotary press which is equal to 8.9 tons per year. This does not exceed the 40 tons per year significant net emissions increase level under 326 IAC 2-2.

326 IAC 8-1-6 (New Facilities)

Pursuant to 326 IAC 8-1-6 (New Facilities) the rotary press does not emit more than 25 tons per year of VOC and therefore it is applicable to this rule. The existing equipment used in this modification is not applicable to this rule because these units were constructed prior to January 1, 1980.

Cooper Tire and Rubber Company Auburn, Indiana Permit Reviewer: ERG/EG

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants)

This rule is not applicable to the rotary press because the source is adding a new piece of equipment to an existing manufacturing line. The rule applies to a manufacturing process not a single piece of equipment that by itself cannot produce a completed product

326 IAC 6-3-2 (Process Operations)

The particulate matter (PM) from the rotary press shall be limited to 1.23 pounds per hour by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$
 where $E =$ rate of emission in pounds per hour and $P =$ process weight rate in tons per hour

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

Conclusion

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification No. 033-12932-00013.

VOC and Particulate from Surface Coating Operations
Company Name: Cooper Tire and Rubber Company

Address City IN Zip: 207 South West Street Auburn 46706

TV OP 033-12932-00013 Plt ID: 033-6253-00013

Reviewer: ERG/EG Date: 01/18/2001

LIMITED PTE

Emission Unit	Material	Density (lb/gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating	Potential VOC (lb/hr)	Potential VOC (lb/day)	Potential VOC (tons/yr)	PM Potential (ton/yr)	Transfer Efficiency
	Kalcor Rust Inhib WD Blk	10.83	51.60%	50.00%	1.60%	0.003	33	0.17	0.02	0.45	0.08	0.38	85%
	Thixon 532-EF	10.83	51.60%	50.00%	1.60%	0.003	33	0.17	0.02	0.45	0.08	0.38	85%
Unit #315	Adhesive	7.71	86.00%	0.00%	86.00%	0.004	132	6.63	3.85	92.43	16.87	0.41	85%
Unit #315	Primer	7.46	82.00%	0.00%	82.00%	0.003	132	6.12	2.66	63.95	11.67	0.38	85%

State Potential Emissions Add worst case coating to all solvents 3.85 156.83 28.62 0.41

PTE

Emission Unit	Material	Density (lb/gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Gal of Mat. (gal/unit)**	Maximum (unit/hour)	Pounds VOC per gallon of coating	Potential VOC (lb/hr)	Potential VOC (lb/day)	Potential VOC (tons/yr)	PM Potential (ton/yr)	Transfer Efficiency
	Kalcor Rust Inhib WD Blk	10.83	51.60%	50.00%	1.60%	0.003	40	0.17	0.02	0.55	0.10	0.45	85%
	Thixon 532-EF	10.00	01.0070	00.0070	1.0070	0.000	10	0.17	0.02	0.00	0.10	0.10	0070
Unit #315	Adhesive	7.71	86.00%	0.00%	86.00%	0.004	160	6.63	4.67	112.03	20.45	0.50	85%
Unit #315	Primer	7.46	82.00%	0.00%	82.00%	0.003	160	6.12	3.23	77.52	14.15	0.47	85%

State Potential Emissions Add worst case coating to all solvents 4.67 190.10 34.69 0.50

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)

Total = Sum of Coating Emissions + Sum of all Solvent Emissions

**The gallon of material is as applied. The weight percent of the HAP is based on mix ratios as applied.

12932ca.wk4 01/01

HAP Emission Calculations

Company Name: Cooper Tire and Rubber Company
Address City IN Zip: 207 South West Street Auburn 46706

SSM 033-12932-00013 TV not yet 033-6253-00013 Reviewer: ERG/EG

Date: 01/18/2001

LIMITED PTE

Emission	Material	Density	Gallons of Material**	Maximum	Weight %	Weight %	Weight %	Weight %	Weight %	Weight %	Weight % Ethylene	Xylene Emissions	Ethylbenzene Emissions	MIBK Emissions	Phenol Emissions	Toluene Emissions	Formaldehyde Emissions	Ethylene Glycol
Unit		(lb/gal)	(gal/unit)	(unit/hour)	Xylene	Ethylbenzene	MIBK	Phenol	Toluene	Formaldehyde	Glycol	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)
Unit #315	Thixon P-11	7.46	0.0033	132	3.80%	1.00%	77.60%	0.90%	0.10%	0.10%	0.00%	0.54	0.14	11.04	0.13	0.01	0.01	0.00
Unit #315	Thixon 532	7.71	0.0044	132	10.60%	2.60%	0.00%	0.00%	72.90%	0.00%	0.00%	2.08	0.51	0.00	0.00	14.30	0.00	0.00
Unit #316	Kalcor	10.83	0.0033	33	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.10%	0.00	0.00	0.00	0.00	0.00	0.00	0.01
										•							•	

2.62

0.65

11.04

0.13

14.31

0.01

0.01

PTE

Total State Potential Emissions

Emission	Material	Density	Gallons of Material**	Maximum	Weight %	Weight %	Weight %	Weight %	Weight %	Weight %	Weight % Ethylene	Xylene Emissions	Ethylbenzene Emissions	MIBK Emissions	Phenol Emissions		Formaldehyde Emissions	Ethylene Glycol
Unit		(lb/gal)	(gal/unit)	(unit/hour)	Xylene	Ethylbenzene	MIBK	Phenol	Toluene	Formaldehyde	Glycol	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)
Unit #315	Thixon P-11	7.46	0.0033	160	3.80%	1.00%	77.60%	0.90%	0.10%	0.10%	0.00%	0.66	0.17	13.39	0.16	0.02	0.02	0.00
Unit #315	Thixon 532	7.71	0.0044	160	10.60%	2.60%	0.00%	0.00%	72.90%	0.00%	0.00%	2.52	0.62	0.00	0.00	17.33	0.00	0.00
Unit #316	Kalcor	10.83	0.0033	40	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.10%	0.00	0.00	0.00	0.00	0.00	0.00	0.01
•																		
Total State P	otential Emiss	ions										3.18	0.79	13.39	0.16	17.35	0.02	0.01

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs **The gallon of material is as applied. The weight percent of the HAP is based on mix ratios as applied.

12932cb.wk4 01/01

VOC, HAP and Particulate from Rubber Producing Operations

Company Name: Cooper Tire and Rubber Company
Address City IN Zip: 207 South West Street Auburn 46706

TV OP 033-12932-00013

Pit ID: 033-6253-00013
Reviewer: ERG/EG
Date: 01/18/2001

Mixing Emission Factor Summary

Limited Rubber Throughput (lbs/year): 2,673,990
Maximum Rubber Throughput (lbs/year): 3,242,820

Analyte Name	CAS#	Max lb/lb rubber	Limited PTE Emissions lbs/year	Limited PTE Emissions tons/yr	PTE Emissions tons/yr
Total VOC		0.00044445	1188	0.59	0.72
Total Speciated Organics		0.00029878	799	0.40	0.48
Total Particulate Matter		0.000925	2473	1.24	1.50
Total Organic HAPs		0.00014041	375	0.19	0.23
Total Metal HAPs		1.739E-07	0	0.00	0.00
Total HAPs		0.00014048	376	0.19	0.23
1,1,1-Trichloroethane	71-55-6	7.314E-07	2		
1,1,2,2-Tetrachloroethane	79-34-5	0	0		
1,1,2-Trichloroethane	79-00-5	0	0		
1,1-Dichloroethane	75-34-3	0	0		
1,1-Dichloroethene	75-35-4	5.470E-07	1		
1,2,4-Trichlorobenzene	120-82-1	0	0		
1,2-Dibromo-3-Chloropropane	96-12-8	0	0		
1,2-Dibromoethane	106-93-4 107-06-2	0	0		
1,2-Dichloroethane		0	0		
1,2-Dichloropropane	78-87-5 106-88-7	0	0		
1,2-Epoxybutane			0		
1,3-Butadiene 1,4-Dibromobenzene	106-99-0 106-37-6	4.673E-07	1		
1,4-Dibromobenzene 1,4-Dichlorobenzene	106-37-6	4.479E-09	0		
1,4-Dioxane	123-91-1	0	0		
1,4-Dioxane 1,4-Phenylenediamine	106-50-3	0	0		
2,4,5-Trichlorophenol	95-95-4	0	0		
2,4,6-Trichlorophenol	88-06-2	0	0		
2,4-Dinitrophenol	51-28-5	0	0		
2.4-Dinitrotoluene	121-14-2	1.618E-08	0		
2-Butanone	78-93-3	0	0		
2-Chloro-1,3-Butadiene	126-99-8	5.911E-06	16		
2-Chloroacetophenone	532-27-4		0		
2-Methylphenol	95-48-7	5.456E-10	0		
3.3'-Dichlorobenzidine	91-94-1	8.636E-08	0		
3,3'-Dimethoxybenzidine	119-90-4	0	0		
3,3'-Dimethylbenzidine	119-93-7	0	0		
4,4'-Methylenedianiline	101-77-9	0	0		
4-Aminobiphenyl	92-67-1	0	0		
4-Methyl-2-Pentanone	108-10-1	0.00003063	82		
4-Nitrobiphenyl	92-93-3	0.00003063	0		
4-Nitrophenol	100-02-7	9.897E-09	0		
a,a,a-Trichlorotoluene	98-07-7	9.697E-09	0		
Acetaldehyde	75-07-0	6.955E-07	2		
Acetaldehyde + Isobutane		6.120E-07	2		
Acetonitrile	75-05-8	4.634E-07	1		
Acetophenone	98-86-2	2.318E-06	6		
Acrolein	107-02-8	8.255E-07	2		
Acrylonitrile	107-13-1	0.00001174	31		
Allyl Chloride	107-05-1	0.00001174	0		
Aniline	62-53-3	5.132E-07	1		
Benzene	71-43-2	6.606E-07	2		
Benzidine	92-87-5	1.801E-08	0		
Benzyl Chloride	100-44-7	0	Õ		
Biphenyl	92-52-4	5.634E-08	0		
bis(2-Chloroethyl)ether	111-44-4	0	0		
bis(2-Ethylhexyl)phthalate	117-81-7	7.397E-07	2		
Bromoform	75-25-2	2.782E-07	1		
Bromomethane	74-83-9	5.624E-08	0		
Cadmium (Cd) Compounds		9.349E-09	0		
Carbon Disulfide	75-15-0	0.00010251	274		
Carbon Tetrachloride	56-23-5	0.0000468	125		
Carbonyl Sulfide	463-58-1	0.00002244	60		
Chlorobenzene	108-90-7	0	0		
Chloroethane	75-00-3	1.702E-06	5		
Chloroform	67-66-3	6.508E-07	2		

VOC, HAP and Particulate from Rubber Producing Operations

Company Name: Cooper Tire and Rubber Company

Address City IN Zip: 207 South West Street
TV OP 033-12932-00013

Plt ID: 033-6253-00013 Reviewer: ERG/EG Date: 01/18/2001

Mixing Emission Factor Summary

Limited Rubber Throughput (lbs/year): 2,673,990 Maximum Rubber Throughput (lbs/year): 3,242,820

			Limited PTE Emissions	Limited PTE	PTE Emissions
Analyte Name	CAS#	rubber	lbs/year	Emissions tons/yr	tons/yr
Chloromethane	74-87-3	8.864E-07	2		
Chromium (Cr) Compounds		1.227E-07	0		
Cobalt (Co) Compounds			0		
Cumene	98-82-8	3.173E-06	8		
Di-n-butylphthalate	84-74-2	3.338E-07	1		
Dibenzofuran	132-64-9	3.417E-08	0		
Dimethylaminoazobenzene	60-11-7	1.637E-08	0		
Dimethylphthalate	131-11-3	1.573E-08	0		
Epichlorohydrin	106-89-8	0	0		
Ethyl Acrylate	140-88-5	4.727E-06	13		
Ethylbenzene	100-41-4	4.324E-06	12		
Hexachlorobenzene	118-74-1	9.294E-09	0		
Hexachlorobutadiene	87-68-3	0	0		
Hexachlorocyclopentadiene	77-47-4	0	0		
Hexachloroethane	67-72-1	1.232E-06	3		
Hexane	110-54-3	0.00011291	302		
Hydroquinone	123-31-9	0.00002625	70		
Iodomethane	74-88-4		0		
Isooctane	540-84-1	7.946E-07	2		
Isophorone	78-59-1	6.632E-07	2		
Lead (Pb) Compounds		2.027E-08	0		
m-Xylene	108-38-3		0		
m-Xylene + p-Xylene		0.00001441	39		
Methyl Methacrylate	80-62-6		0		
Methylene bis-chloroaniline	101-14-4	0	0		
Methylene Chloride	75-09-2	0.00003862	103		
N,N-Dimethylaniline	121-69-7	0	0		
N-Nitrosodimethylamine	62-75-9	0	0		
N-Nitrosodiphenylamine	86-30-6	2.339E-09	0		
N-Nitrosomorpholine	59-89-2	0	0		
Naphthalene	91-20-3	3.083E-07	1		
Nickel (Ni) Compounds		9.527E-08	0		
Nitrobenzene	98-95-3	2.018E-08	0		
o-Anisidine	90-04-0	0	0		
o-Toluidine	95-53-4	2.232E-07	1		
o-Xylene	95-47-6	7.730E-06	21		
p-Xylene	106-42-3		0		
Pentachloronitrobenzene	82-68-8	0	0		
Pentachlorophenol	87-86-5	1.251E-08	0		
Phenol	108-95-2	1.269E-06	3		
Propanal	123-38-6	3.327E-06	9		
Propylene Oxide	75-56-9	6.965E-06	19		
Styrene	100-42-5	4.251E-06	11		
Substituted Quinoline	91-22-5	4.251E-00			
t-Butyl Methyl Ether	1634-04-4		0		
		7.983E-06	21		
Tetrachloroethene	127-18-4	4.099E-06	11		
Toluene	108-88-3	0.00002305	62		
Trichloroethene	79-01-6	2.218E-07	1		
Trifluralin	1582-09-8	0	0		
Vinyl Acetate	108-05-4				
Vinyl Bromide	593-60-2	2.346E-06	6		
Vinyl Chloride	75-01-4		0		
viriyi Chilonae	10-01-4	1.316E-08	0		

VOC, HAP and Particulate from Rubber Producing Operations

Company Name: Cooper Tire and Rubber Company
Address City IN Zip: 207 South West Street Auburn 46706

TV OP 033-12932-00013

Plt ID: 033-6253-00013
Reviewer: ERG/EG
Date: 01/18/2001

Extruding Emission Factor Summary

Limited Rubber Throughput (lbs/year): 2,673,990
Maximum Rubber Throughput (lbs/year): 3,242,820

Analyte Name	CAS#	Max lb/lb rubber	Limited Emissions Ibs/year	Limited Emissions tons/yr	Max Emissions tons/yr
Total VOC	UA0#	1.06E-04	285	0.14	0.17
Total Speciated Organics		1.60E-04	428	0.14	0.17
Total Particulate Matter		1.12E-07	0	0.00	0.00
Total Organic HAPs		7.52E-05	201	0.10	0.12
Total Metal HAPs		7.55E-07	2	0.00	0.00
Total HAPs		7.52E-05		0.10	0.12
1,1,1-Trichloroethane	71-55-6	3.92E-07	1	0.10	Ų. IZ
1,1,2,2-Tetrachloroethane	79-34-5	0.00E+00			
1.1.2-Trichloroethane	79-00-5	0.00E+00	0		
1,1-Dichloroethane	75-34-3	0.00E+00	0		
1.1-Dichloroethene	75-35-4	1.17E-07	0		
1,2,4-Trichlorobenzene	120-82-1	0.00E+00	0		
1,2-Dibromo-3-Chloropropane	96-12-8	0.00E+00 0.00E+00	0		
1,2-Dibromoethane	106-93-4	0.00E+00	0		
1,2-Dichloroethane	107-06-2	0.00E+00 0.00E+00	0		
1,2-Dichloropropane	78-87-5				
1,2-Epoxybutane	106-88-7	0.00E+00	0		
1,3-Butadiene	106-99-0	5 005 07	0		
1.4-Dibromobenzene	106-33-6	5.06E-07	1		
1.4-Diblomobenzene	106-37-0	2.40E-09	0		
1,4-Dioxane	123-91-1	8.36E-09	0		
		1.67E-07	0		
1,4-Phenylenediamine	106-50-3	0.00E+00	0		
2,4,5-Trichlorophenol	95-95-4	0.00E+00	0		
2,4,6-Trichlorophenol	88-06-2	0.00E+00	0		
2,4-Dinitrophenol	51-28-5	8.67E-09	0		
2,4-Dinitrotoluene	121-14-2	0.00E+00	0		
2-Butanone	78-93-3	3.17E-06	8		
2-Chloro-1,3-Butadiene	126-99-8		0		
2-Chloroacetophenone	532-27-4	6.48E-09	0		
2-Methylphenol	95-48-7	4.63E-08	0		
3,3'-Dichlorobenzidine	91-94-1	0.00E+00	0		
3,3'-Dimethoxybenzidine	119-90-4	0.00E+00	0		
3,3'-Dimethylbenzidine	119-93-7	0.00E+00	0		
4,4'-Methylenedianiline	101-77-9	0.00E+00	0		
4-Aminobiphenyl	92-67-1	0.00E+00	0		
4-Methyl-2-Pentanone	108-10-1	6.73E-06	18		
4-Nitrobiphenyl	92-93-3	0.00E+00	0		
4-Nitrophenol	100-02-7	5.30E-09	0		
a,a,a-Trichlorotoluene	98-07-7	0.00E+00	0		
Acetaldehyde	75-07-0	3.73E-07	1		
Acetaldehyde + Isobutane		3.28E-07	1		
Acetonitrile	75-05-8	2.48E-07	1		
Acetophenone	98-86-2	8.18E-06	22		
Acrolein	107-02-8	4.42E-07	1		
Acrylonitrile	107-13-1	6.29E-06	17		
Allyl Chloride	107-05-1	0.29L-00 0.00E+00	0		
Aniline	62-53-3	5.08E-07	1		
Benzene	71-43-2	3.54E-07	1		
Benzidine	92-87-5				
Benzyl Chloride	100-44-7	1.26E-08			
Biphenyl	92-52-4	0.00E+00			
bis(2-Chloroethyl)ether	111-44-4	3.02E-08			
bis(2-Ethylhexyl)phthalate	117-81-7	0.00E+00			
Bromoform	75-25-2	3.96E-07			
Bromomethane	75-25-2 74-83-9	1.49E-07			
	/4-83-9	3.01E-08			
Cadmium (Cd) Compounds	75.45.0		0		
Carbon Disulfide	75-15-0	2.43E-08			
Carbon Tetrachloride	56-23-5	5.49E-05			
Carbonyl Sulfide	463-58-1	2.51E-05			
Chlorobenzene	108-90-7	1.20E-05	32		
Chloroethane	75-00-3	0.00E+00	0		

Appendix A: Emissions Calculations VOC, HAP and Particulate from Rubber Producing Operations

Company Name: Cooper Tire and Rubber Company
Address City IN Zip: 207 South West Street Auburn 46706
TV OP 033-12932-00013

Pit ID: 033-12932-00013
Reviewer: ERG/EG
Date: 01/18/2001

Extruding Emission Factor Summary

Limited Rubber Throughput (lbs/year):2,673,990Maximum Rubber Throughput (lbs/year):3,242,820

Analyte Name	CAS#	Max lb/lb rubber	Limited Emissions lbs/year	Limited Emissions tons/yr	Max Emissions tons/yr
Chloroform	67-66-3	3.49E-07	1		·
Chloromethane	74-87-3	4.75E-07	1		
Chromium (Cr) Compounds		2.54E-07	1		
Cobalt (Co) Compounds		1.90E-08	0		
Cumene	98-82-8	1.82E-06	5		
Di-n-butylphthalate	84-74-2	3.65E-07	1		
Dibenzofuran	132-64-9	1.83E-08			
Dimethylaminoazobenzene	60-11-7	8.77E-09	0		
Dimethylphthalate	131-11-3	8.43E-09	0		
Epichlorohydrin	106-89-8	0.00E+00	0		
Ethyl Acrylate	140-88-5	2.53E-06	7		
Ethylbenzene	100-41-4	2.32E-06	6		
Hexachlorobenzene	118-74-1	4.98E-09	0		
Hexachlorobutadiene	87-68-3	1.72E-07	0		
Hexachlorocyclopentadiene	77-47-4	0.00E+00	0		
Hexachloroethane	67-72-1	6.60E-07	2		
Hexane	110-54-3	6.05E-05	162		
Hydroquinone	123-31-9	1.41E-05			
Iodomethane	74-88-4	1.41L-03	0		
Isooctane	540-84-1	4.12E-07	1		
Isophorone	78-59-1	3.55E-07	1		
Lead (Pb) Compounds		3.55E-07	0		
m-Xylene	108-38-3		0		
m-Xylene + p-Xylene	100 00 0	7.72E-06			
Methyl Methacrylate	80-62-6	1.12E-00	0		
Methylene bis-chloroaniline	101-14-4	0.00E+00	0		
Methylene Chloride	75-09-2	2.07E-05			
N,N-Dimethylaniline	121-69-7	5.45E-09	0		
N-Nitrosodimethylamine	62-75-9	0.00E+00	0		
N-Nitrosodiphenylamine	86-30-6	1.25E-09	0		
N-Nitrosomorpholine	59-89-2	0.00E+00	0		
Naphthalene	91-20-3	1.96E-06	5		
Nickel (Ni) Compounds	01200		1		
Nitrobenzene	98-95-3	4.91E-07			
o-Anisidine	90-04-0	1.08E-08			
o-Toluidine	95-53-4	0.00E+00	0		
o-Xylene	95-47-6	1.50E-07			
p-Xylene	106-42-3	4.14E-06	11		
Pentachloronitrobenzene	82-68-8	0.005.00	0		
Pentachlorophenol	87-86-5	0.00E+00	0		
Phenol	108-95-2	6.70E-09	0		
Propanal	123-38-6	6.80E-07	2		
Propylene Oxide	75-56-9	1.78E-06			
Styrene	100-42-5	3.73E-06	10		
Substituted Quinoline	91-22-5	7.25E-07	2		
t-Butyl Methyl Ether	1634-04-4		0		
Tetrachloroethene	127-18-4	4.28E-06	11		
Toluene	127-18-4	2.20E-06			
Trichloroethene	79-01-6	1.24E-05			
		3.30E-07	1		
Trifluralin	1582-09-8	0.00E+00	0		
Vinyl Acetate	108-05-4	1.26E-06			
Vinyl Bromide	593-60-2		0		
Vinyl Chloride	75-01-4	3.26E-08	0		

VOC, HAP and Particulate from Rubber Producing Operations
Company Name: Cooper Tire and Rubber Company
Address City IN Zip: 207 South West Street Auburn 46706

TV OP 033-12932-00013
PIt ID: 033-6253-00013
Reviewer: ERG/EG
Date: 01/18/2001

Platen Curing Emission Factor Summary

Limited Rubber Throughput (Ibs/year): 2,673,990
Maximum Rubber Throughput (Ibs/year): 3,242,820

Analyte Name	CAS#	Max lb/lb rubber	Limited Emissions Ibs/year	Limited Emissions Tons/year	Maximum Emissions Tons/year
Total VOC	CA3#	6.68E-03	17,871	8.94	10.84
Total Speciated Organics		3.29E-03	8,808	4.40	5.34
Total Particulate Matter			0	0.00	0.00
Total Organic HAPs		1.36E-03	3,638	1.82	2.21
Total Metal HAPs			0	0.00	0.00
Total HAPs		1.36E-03	3,638	1.82	2.21
1,1,1-Trichloroethane	71-55-6	3.56E-04	953		0.58
1,1,2,2-Tetrachloroethane	79-34-5	0.00E+00	0		0.00
1,1,2-Trichloroethane	79-00-5	0.00E+00	0		0.00
1,1-Dichloroethane	75-34-3	0.00E+00	0		0.00
1,1-Dichloroethene	75-35-4	1.07E-05	29		0.02
1,2,4-Trichlorobenzene	120-82-1	1.66E-08	0		0.00
1,2-Dibromo-3-Chloropropane	96-12-8	0.00E+00	0		0.00
1,2-Dibromoethane	106-93-4	0.00E+00	0		0.00
1,2-Dichloroethane	107-06-2	0.00E+00	0		0.00
1,2-Dichloropropane	78-87-5	0.00E+00	0		0.00
1,2-Epoxybutane	106-88-7		0		0.00
1,3-Butadiene	106-99-0	2.56E-05	69		0.04
1,4-Dibromobenzene	106-37-6		0		0.00
1,4-Dichlorobenzene	106-46-7	1.03E-07	0		0.00
1,4-Dioxane	123-91-1	0.00E+00	0		0.00
1,4-Phenylenediamine	106-50-3	0.00E+00	0		0.00
2,4,5-Trichlorophenol	95-95-4	0.00E+00	0		0.00
2,4,6-Trichlorophenol	88-06-2	0.00E+00	0		0.00
2,4-Dinitrophenol	51-28-5	0.00E+00	0		0.00
2,4-Dinitrotoluene	121-14-2	0.00E+00	0		0.00
2-Butanone	78-93-3	5.35E-05	143		0.09
2-Chloro-1,3-Butadiene	126-99-8	9.08E-06	24		0.01
2-Chloroacetophenone	532-27-4	0.00E+00	0		0.00
2-Methylphenol	95-48-7	1.17E-07	0		0.00
3,3'-Dichlorobenzidine	91-94-1	0.00E+00	0		0.00
3,3'-Dimethoxybenzidine	119-90-4	0.00E+00	0		0.00
3,3'-Dimethylbenzidine	119-93-7	0.00E+00	0		0.00
4,4'-Methylenedianiline	101-77-9	0.00E+00	0		0.00
4-Aminobiphenyl	92-67-1	0.00E+00	0		0.00
4-Methyl-2-Pentanone	108-10-1	5.99E-04	1,601		0.97
4-Nitrobiphenyl	92-93-3	0.00E+00	0		0.00
4-Nitrophenol	100-02-7	0.00E+00	0		0.00
a,a,a-Trichlorotoluene	98-07-7	0.00E+00	0		0.00
Acetaldehyde	75-07-0	1.00E-05	27		0.02
Acetaldehyde + Isobutane			0		0.00
Acetonitrile	75-05-8	5.47E-06	15		0.01
Acetophenone	98-86-2	4.39E-04	1,175		0.71
Acrolein	107-02-8	4.44E-06	12		0.01
Acrylonitrile	107-13-1	3.02E-05	81		0.05
Allyl Chloride	107-05-1	0.00E+00	0		0.00
Aniline	62-53-3	1.02E-03	2,715		1.65
Benzene	71-43-2	5.62E-06	15		0.01
Benzidine	92-87-5	4.53E-06	12		0.01
Benzyl Chloride	100-44-7	0.00E+00	0		0.00
Biphenyl	92-52-4	3.06E-07	1		0.00
bis(2-Chloroethyl)ether	111-44-4	0.00E+00	0		0.00
bis(2-Ethylhexyl)phthalate	117-81-7	1.78E-05	48		0.03
Bromoform	75-25-2	0.00E+00	0		0.00
Bromomethane	74-83-9	0.00E+00	0		0.00
Cadmium (Cd) Compounds			0		0.00
Carbon Disulfide	75-15-0	1.32E-03	3,534		2.14
Carbon Tetrachloride	56-23-5	9.15E-04	2,446		1.48
Carbonyl Sulfide	463-58-1	4.39E-04			0.71
Chlorobenzene	108-90-7	0.00E+00			0.00

Appendix A: Emissions Calculations VOC, HAP and Particulate from Rubber Producing Operations

Company Name: Cooper Tire and Rubber Company
Address City IN Zip: 207 South West Street Auburn 46706

TV OP 033-12932-00013
PIt ID: 033-6253-00013
Reviewer: ERG/EG
Date: 01/18/2001

Platen Curing Emission Factor Summary

Limited Rubber Throughput (Ibs/year): 2,673,990
Maximum Rubber Throughput (Ibs/year): 3,242,820

			Limited Emissions		Maximum Emissions
Analyte Name	CAS#	rubber	lbs/year	Tons/year	Tons/year
Chloroethane	75-00-3	1.48E-06	4		0.00
Chloroform	67-66-3	1.27E-05	34		0.02
Chloromethane	74-87-3	7.68E-06	21		0.01
Chromium (Cr) Compounds			0		0.00
Cobalt (Co) Compounds			0		0.00
Cumene	98-82-8	2.76E-06	7		0.00
Di-n-butylphthalate	84-74-2	9.64E-06	26		0.02
Dibenzofuran	132-64-9	1.54E-07	0		0.00
Dimethylaminoazobenzene	60-11-7	3.20E-07	1		0.00
Dimethylphthalate	131-11-3	1.80E-07	0		0.00
Epichlorohydrin	106-89-8	0.00E+00	0		0.00
Ethyl Acrylate	140-88-5		0		0.00
Ethylbenzene	100-41-4	5.43E-06	15		0.01
Hexachlorobenzene	118-74-1	0.00E+00	0		0.00
Hexachlorobutadiene	87-68-3	3.93E-07	1		0.00
Hexachlorocyclopentadiene	77-47-4	0.00E+00	0		0.00
Hexachloroethane	67-72-1	2.41E-05	64		0.04
Hexane	110-54-3	3.00E-04	801		0.49
Hydroquinone	123-31-9	1.58E-05	42		0.03
Iodomethane	74-88-4		0		0.00
Isooctane	540-84-1	4.81E-06	13		0.01
Isophorone	78-59-1	1.16E-06	3		0.00
Lead (Pb) Compounds			0		0.00
m-Xylene	108-38-3		0		0.00
m-Xylene + p-Xylene		1.73E-05	46		0.03
Methyl Methacrylate	80-62-6	1.702 00	0		0.00
Methylene bis-chloroaniline	101-14-4	0.00E+00	0		0.00
Methylene Chloride	75-09-2	4.87E-05	130		0.08
N,N-Dimethylaniline	121-69-7	0.00E+00	0		0.00
N-Nitrosodimethylamine	62-75-9	0.00E+00	0		0.00
N-Nitrosodiphenylamine	86-30-6	0.002100	0		0.00
N-Nitrosomorpholine	59-89-2	0.00E+00	0		0.00
Naphthalene	91-20-3	4.04E-06	11		0.00
Nickel (Ni) Compounds	01200	4.04E-00	0		
Nitrobenzene	98-95-3	0.005+00			0.00
o-Anisidine	90-04-0	0.00E+00 0.00E+00	0		0.00
o-Toluidine	95-53-4		12		0.00
o-Xylene	95-47-6	4.36E-06			0.01
p-Xylene	106-42-3	1.86E-05	50		0.03
Pentachloronitrobenzene	82-68-8	0.005.00	0		0.00
Pentachlorophenol	87-86-5	0.00E+00	0		0.00
•		0.00E+00	0		0.00
Phenol	108-95-2	2.67E-06	7		0.00
Propanal	123-38-6		0		0.00
Propylene Oxide	75-56-9	1.04E-04	278		0.17
Styrene	100-42-5	8.31E-05	222		0.13
Substituted Quinoline	91-22-5		0		0.00
t-Butyl Methyl Ether	1634-04-4	1.56E-04	417		0.25
Tetrachloroethene	127-18-4	1.36E-05	36		0.02
Toluene	108-88-3	3.96E-05	106		0.06
Trichloroethene	79-01-6	0.00E+00	0		0.00
Trifluralin	1582-09-8	0.00E+00	0		0.00
Vinyl Acetate	108-05-4	0.00E+00	0		0.00
Vinyl Bromide	593-60-2		0		0.00
Vinyl Chloride	75-01-4	2.57E-07	1		0.00

Appendix A: Emissions Calculations Adhesive, Coating Multipliers and Rotary Press Specs Company Name: Cooper Tire and Rubber Company Address City IN Zip: 207 South West Street Auburn 46706

TV OP 033-12932-00013
PIt ID: 033-6253-00013
Reviewer: ERG/EG
Date: 01/18/2001

Adhesive and Coating Multipliers

Mix	Cooper Code	Product Wt. (lbs/gal)	% HAP in Product	HAP Content (lbs /gal)	Mix Ratio (Vol %)	Mixed Wt. (lbs/gal)	Mixed HAP (lbs /qal)	Code # HAP (lbs/gal)	HAP Mult
Morton P-1	1 Code 7329								
P-11 MIBK	7651 7303	7.8 6.76	68.0% 100.0%	5.304 6.76	67 33	5.226 2.231	3.554 2.231	5.784	0.776
Xylene									
P-11 MIBK	7651 7303	7.8 6.76	5.4% 0.0%	0.4212 0	67 33	5.226 2.231	0.282 0.000	0.282	0.038
Ethyl Benzen	е								
P-11 MIBK	7651 7303	7.8 6.76	1.4% 0.0%	0.1092 0	67 33	5.226 2.231	0.073 0.000	0.073	0.010
Phenol									
P-11 MIBK	7651 7303	7.8 6.76	1.3% 0.0%	0.1014 0	67 33	5.226 2.231	0.068 0.000	0.068	0.009
Toluene									
P-11 MIBK	7651 7303	7.8 6.76	0.2% 0.0%	0.0156 0	67 33	5.226 2.231	0.010 0.000	0.010	0.001
Formaldehyde	е								
P-11 MIBK	7651 7303	7.8 6.76	0.1% 0.0%	0.0078 0	67 33	5.226 2.231	0.005 0.000	0.005	0.001
Morton 532 Toluene	2- Code 7360								
532 Toluene	7646 7370	8.1 7.26	51.4% 100.0%	4.1634 7.26	53 47	4.293 3.412	2.207 3.412	5.619	0.729
Xylene									
532 Toluene	7646 7370	8.1 7.26	19.0% 0.0%	1.539 0	53 47	4.293 3.412	0.816 0.000	0.816	0.106
Ethyl Benzen									
532 Toluene	7646 7370	8.1 7.26	4.7% 0.0%	0.3807 0	53 47	4.293 3.412	0.202 0.000	0.202	0.026
Kalcor- Co	de 7656	112-34-5							
Kalcor water	7640 7399	11.2 8.34	1.7% 0.0%	0.1904 0	87 13	9.744 1.084	0.166 0.000	0.166	0.015
Ethylene Glyd		107-21-1		-	-	- - -			
Kalcor water	7640 7399	11.2 8.34	0.1% 0.0%	0.0112 0	87 13	9.744 1.084	0.010 0.000	0.010	0.001

Rotary Press Specifications

8 parts in 12 min	Thus	0.667 pc/ min		
therefore				
0.667 pc/min	*	60 min	=	40.0 pc/hr
40.0 hour	*	24 hrs	=	960.48 pc/day
960.48 pc/day	*	365 days/year	=	350575.2 pc/year
350575.2 pc/year	*	9.25 lbs rub/ pc	=	3242820.6 lbs rubber /year